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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 Bernard Young,

13 Petitioner,

14 v.

15 Renee Baker, *et al.*,

16 Respondents.

Case No. 2:18-cv-00110-RFB-VCF

**Unopposed Motion to Extend Time
to File Reply to Answer**

(Second request)

1 Petitioner Bernard Young respectfully moves for an extension of 62 days to file
2 his Reply to Respondents' Answer (ECF No. 47), up to and including Monday, June
3 21, 2021. On January 14, 2021, Respondents filed their Answer to Mr. Young's second
4 amended petition under 28 U.S.C. § 2254. (ECF No. 47.) Mr. Young's Reply is
5 currently due on April 19, 2021. (ECF No. 49.) Respondents, by Deputy Attorney
6 General Geordan Goebel, do not object to this request. Respondents' lack of objection
7 to this request should not be construed as a waiver of any procedural defense or
8 argument. This is Mr. Young's second request for an extension.

9 Counsel respectfully suggests additional time remains necessary to properly
10 prepare the Reply. Undersigned counsel returned from maternity leave on March 15,
11 2021. Since her return, counsel has been diligently working on getting up to speed on
12 her cases, including Mr. Young's. In addition to work on Mr. Young's case, in the next
13 few weeks, counsel has deadlines for two reply briefs in the Ninth Circuit, an
14 amended habeas petition, and an opening brief in the Nevada Supreme Court.

15 This motion is not filed for the purposes of delay, but in the interests of justice
16 and the interests of Mr. Young. Counsel respectfully asks this Court to grant
17 Mr. Young's request to extend the time for filing his Reply to Respondents' Answer
18 by 62 days, until Monday, June 21, 2021.

1 Dated April 19, 2021.


2 Respectfully submitted,

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4 Rene L. Valladares
5 Federal Public Defender

6 */s/ Emma L. Smith*

7 Emma L. Smith
8 Assistant Federal Public Defender

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11 IT IS SO ORDERED:

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15 **RICHARD E. BOULWARE, II**
16 **United States District Court**

17 DATED this 20th day of April, 2021.
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